

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO ALL  
ACTIONS

**SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF LUBERTHA POWELL**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendant Torrent Pharma, Inc. and Torrent Pharmaceuticals, Ltd. (“Torrent”) will take the deposition upon oral examination of Lubertha Powell on June 30, 2021 at 9:00 a.m. EST at 1112 Heph-McBean Rd., Hephzibah, GA 30815.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The attorney contact for the deposition and lead questioner is:

Brittney Nagle  
Kirkland & Ellis LLP  
601 Lexington Ave  
New York, NY 10022  
212-390-4210  
brittney.nagle@kirkland.com

Date: June 28, 2021

Respectfully submitted,

s/ Brittney M. Nagle  
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*Attorney for Defendant Torrent Pharma, Inc.  
and Torrent Pharmaceuticals, Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of June 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Lubertha Powell was served upon all counsel of record via CM/ECF.

s/ *Brittney M. Nagle*  
Brittney M. Nagle